

Commonwealth of Kentucky
Division for Air Quality
COMMENTS AND RESPONSE
ON THE DRAFT PERMIT

Conditional Major, Operating
Permit: F-08-009
Polymer Partners, LLC
Henderson, KY 42420
May 21, 2008
Durga Patil, Reviewer

SOURCE ID:	21-101-00125
AGENCY INTEREST:	1831
ACTIVITY:	APE20080001

SOURCE DESCRIPTION:

Polymer Partners (previously named Clariant) located at 1450 Commonwealth Drive, Henderson, Kentucky, manufactures black plastic color concentrates through a process of compounding various polymer resins with carbon black, calcium carbonate and/or other filler materials. Physical processes taking place include pneumatically feeding raw materials from silos and dump stations equipped to handle super sacks of carbon black and plastic resins into hoppers on the compounding lines. Thermal processes include the heating of the polymer resin and additives to product specific temperatures and mixing in the compounding line. The finished product is fed to a pelletizer and dewatering system.

The source is currently classified as conditional major. The source has applied for permit renewal for conditional major status under 401 KAR 52:030, federally enforceable permits.

Over the years the company has undergone a number of changes. The initial permit was issued in September 1997 (F-97-008). Then due to modifications in the plant, the company applied for and secured a significant modification permit to the original conditional major permit (F-97-008 R1) in December 1999. The modifications included the addition of a new production line "Line 23" which is to be primarily used for research and development. This modification added three new emission points: a polymer dump station; a polymer feed station; and a Ferrel continuous mixer. There was also a relocation of the 100 and 300 cubic feed ribbon blenders resulting in two additional emission points in process room #2. The permit was renewed in August 2003 (F-03-012). Along with the renewal application, changes were made with the addition of two additive stations for the #6 and #9 FCM mixers and the removal of the 300 cu. ft. ribbon blender, the removal of the ZSE-50 twin screw line, the replacement of the Batenfil lab molding machine with a Boy unit lab molding machine and the addition of a cook off as an insignificant activity. In March 2007, the permit underwent a minor revision (F-03-012 R1) with the addition of new facilities (PR-45-2 and #63) and an increase in the process rates in existing facilities. The present renewal (F-08-009) received on January 22, 2008 has no process changes to the F-03-012 R1 permit issued in March 2007.

PUBLIC AND AFFECTED STATE REVIEW:

The affected state, Indiana, was notified of the issuance of the draft permit on March 19, 2008 via e-mail. On March 21, 2008, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in The Henderson Gleaner, Henderson, Kentucky. The public comment period expired 30 days from the date of publication. No other states are affected by this permit action.

A comment was received from Polymer Partners on April 21, 2008. The following is a detailed explanation of changes made to the permit.

COMMENTS AND RESPONSE:

Comment on Polymer Partners' Conditional Major, Operating Air Quality Permit submitted by Mickey Brynes, Safety Engineer, of Safety & Environmental Technologies, inc.

Draft Permit

With reference to page 6 of the Draft permit Specific Recordkeeping Requirement: Due to the minimal amounts of VOC, HAP and PM emitted and the complexity of monthly recordkeeping and emission calculations, the facility requests that they submit only semi-annual and annual report to the Division.

Division's response: Comment acknowledged. The permit was revised as outlined below:

Section B.5 Specific Recordkeeping Requirements

Subsection '5.a' has been replaced to read "refer to Section D and Section F.2"

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.